## Case 22-13128-amc Doc 62 Filed 04/13/24 Entered 04/14/24 00:32:52 Desc Imaged Certificate of Notice Page 1 of 6

United States Bankruptcy Court Eastern District of Pennsylvania

In re: Case No. 22-13128-amc

Vaneese Marie Walker Chapter 13

Debtor

CERTIFICATE OF NOTICE

District/off: 0313-2 User: admin Page 1 of 2
Date Rcvd: Apr 11, 2024 Form ID: pdf900 Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol Definition

Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS

regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 13, 2024:

Recipi ID Recipient Name and Address

db + Vaneese Marie Walker, 7337 N. 19th Street, Philadelphia, PA 19126-1541

TOTAL: 1

 $Notice\ by\ electronic\ transmission\ was\ sent\ to\ the\ following\ persons/entities\ by\ the\ Bankruptcy\ Noticing\ Center.$ 

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

### **BYPASSED RECIPIENTS**

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

#### NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Apr 13, 2024 Signature: /s/Gustava Winters

### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 11, 2024 at the address(es) listed below:

Name Email Address

KERI P EBECK

on behalf of Creditor Global Lending Services LLC kebeck@bernsteinlaw.com btemple@bernsteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bernsteinlaw.com

MARY F. KENNEDY

on behalf of Creditor Citizens Bank N.A. f/k/a RBS Citizens, N.A. mary@javardianlaw.com,

tami@javardianlaw.com;angie.harrigan@javardianlaw.com

MICHAEL A. CIBIK

on behalf of Debtor Vaneese Marie Walker help@cibiklaw.com

noreply01@cibiklaw.com;noreply02@cibiklaw.com;noreply03@cibiklaw.com;noreply04@cibiklaw.com;noreply05@cibiklaw.com

m;cibiklawpc@jubileebk.net;cibiklaw@recap.email;ecf@casedriver.com

MICHAEL I. ASSAD

on behalf of Debtor Vaneese Marie Walker help@cibiklaw.com

noreply 01 @cibiklaw.com; noreply 02 @cibiklaw.com; noreply 03 @cibiklaw.com; noreply 04 @cibiklaw.com; noreply 05 @cibi

m;cibiklawpc@jubileebk.net;cibiklaw@recap.email;ecf@casedriver.com

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MILOS GVOZDENOVIC

on behalf of Creditor Citizens Bank N.A. mgvozdenovic@weltman.com, pitecf@weltman.com

SCOTT F. WATERMAN [Chapter 13] ECFMail@ReadingCh13.com

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 7

LAW OFFICES OF GREGORY JAVARDIAN
By Mary F. Kennedy, Esquire
Attorney I.D. # 77149
1310 Industrial Blvd.
1st Floor, Suite 101
Southampton, PA 18966
(215) 942-9690
Attorney for Citizens Bank, N.A., f/k/a RBS Citizens, N.A.

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Chapter 13 Proceeding

Vaneese Marie Walker

Debtor(s)

22-13128 AMC

Citizens Bank, N.A., f/k/a RBS Citizens, N.A.
Movant

v.

Vaneese Marie Walker Respondent

# STIPULATION BY AND BETWEEN VANEESE MARIE WALKER AND CITIZENS BANK, N.A., F/K/A RBS CITIZENS, N.A.

WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Motion for Relief from the Automatic Stay filed by Mary F. Kennedy on behalf of mortgagee, Citizens Bank, N.A., f/k/a RBS Citizens, N.A. ("Movant").

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

 Movant is a mortgagee and holder of a perfected, secured claim against the Debtor pursuant to a Note and Mortgage on Debtor's real estate known as at 7337 N. 19th Street, Philadelphia, PA 19126.

- 2. Upon approval by the United States Bankruptcy Court of the within Stipulation, Debtor and secured creditor, Citizens Bank, N.A., f/k/a RBS Citizens, N.A., agree to the following:
  - (a) Debtor(s) acknowledges that the current regular monthly post-petition mortgage payment is \$1,277.88 per month. The monthly payment is subject to change in accordance with the terms of the Note and Mortgage.
  - (b) Debtor(s) acknowledge that debtor(s) is currently due for the following amounts post-petition:

2/1/2024 Payment	\$1,277.88
3/1/2024 Payment	\$1,277.88
Motion for Relief Attorney Fees & Costs	\$1,249.00
Suspense	-\$744.24
TOTAL	\$3,060.52

- (c) Commencing with the April 1, 2024, payment the Debtor(s) shall resume and shall continue to make all regular monthly post petition mortgage payments when they are due in accordance with said Note and Mortgage.
- (d) Within fifteen (15) days of the Court's approval of this Stipulation, Debtor(s) shall amend the Plan to provide for the payment of the post-petition arrears of \$3,060.52 to Movant through the Plan.
- (e) Within fifteen (15) days of the Court's approval of this Stipulation Movant shall amend its Proof of Claim to add the \$3,060.52 in post-petition arrears to its arrears claim.
- (f) All payments from Debtor(s) to Citizens Bank, N.A., f/k/a RBS Citizens, N.A. its successors and/or assigns shall be in the form of certified funds or Trustee checks if conduit payments.

- (g) The provisions of the Stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this Stipulation, including fees and costs, due under the terms of the mortgage and applicable law.
- (h) The Debtor(s) shall timely tender all payments and comply with all conditions in accordance with this Stipulation. If such payments or conditions are not timely made, Movant may provide the Debtor(s) and their counsel with fifteen (15) days written notice of default. If the default is not cured within the fifteen (15) day period, Movant may certify the default to this Court and an Order shall be entered granting Citizens Bank, N.A., f/k/a RBS Citizens, N.A. its successors and/or assigns relief from the automatic stay without further notice and hearing.
- (i) Should Citizens Bank, N.A., f/k/a RBS Citizens, N.A. its successors and/or assigns be granted relief from the stay after filing a Certification of Default in accordance with paragraph 2(h) above, the parties agree that the said relief order shall include the following language: "bankruptcy Rule 4001(a)(3) is not applicable and Movant is allowed to immediately proceed with foreclosure and all other relief available under the Non Bankruptcy law."
- (j) Should Citizens Bank, N.A., f/k/a RBS Citizens, N.A. its successors and/or assigns be granted relief from the stay after filing a Certification of Default in accordance with paragraph 2(h) above, the parties agree that the said relief order shall include the following language: "Federal Rule of Bankruptcy

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Procedure 3002.1 is no longer applicable to Citizens Bank, N.A., f/k/a RBS Citizens, N.A. and/or its successors and assigns.

(k) The parties agree that a facsimile may be submitted to the Court as if it were an original.

#### STIPULATED AND AGREED TO BY:

/s/ Michael Assad	Date: 04/08/2024
Michael L. Assad, Esquire	
Attorney for Debtor, Vaneese Marie Walker	
Mary F. Kennedy, Esquire Attorney for Citizens Bank, N.A., f/k/a RBS Cit	Date: 4/8/2024 tizens, N.A.
/s/ Ann Swartz  For Scott F. Waterman, Esquire  Trustee	Date: _4/9/2024
On this <u>11th</u> day of <u>April</u>	, 2024, approved by the Court.  United States Bankruptcy Judge

Ashely M. Chan.